

Exhibit A

SAUL EWING
ARNSTEIN
& LEHR^{LLP}

Phillip M. Hudson III
Phone: 305.357.2003
phil.hudson@saul.com
www.saul.com

October 19, 2018

Via Email and Overnight Mail
(Jacqueline.marcus@weil.com)

Jacqueline Marcus, Esq.
Weil Gotshal & Manges, LLP
767 5th Avenue
New York, NY 10153

Via Overnight Mail
Sears Holding Corporation
3333 Beverly Road
Hoffman Estates, IL 60179

**Re: In re Sears Holding Corporation, et al., 18-23538 (RDD) (Bankr. S.D.N.Y)
Amended Demand for Reclamation Pursuant to 11 U.S.C. § 546(c)**

Dear Ms. Marcus:

Pursuant to U.C.C. § 2-702 and Section 546(c) of the United States Bankruptcy Code, 11 U.S.C. § 546(c), demand is hereby made upon Sears Holding Corporation (“Sears”) for the reclamation and return of all goods (the “Goods”) that were shipped to Sears and/or any of its subsidiaries and affiliates by Invicta Watch Company of America, Inc. (“Invicta”) in the ordinary course of business, where such goods were received by Sears within forty-five (45) days preceding the date upon which Sears filed its bankruptcy petition in the United States Bankruptcy Court for the Southern District of New York (the “Petition Date”).

This demand covers two (2) invoices not less than \$391, 161.40 for the Goods that were delivered to Sears prior to the Petition Date, and for the proceeds of any Goods that may have been sold. Copies of the invoices are enclosed herein. *See Exhibit A.* Further, it is our understanding that the Goods delivered on October 1, 2018 remain in their original packaging from Invicta at the Illinois warehouse where they were delivered to Sears.

Demand is made that the Goods sought to be reclaimed hereby continue to be segregated from Sears’ other inventory and set aside for pickup by Invicta, except to the extent, if any, prohibited by the Bankruptcy Court in Case Number 18-23538 (RDD).

Southeast Financial Center • 200 S. Biscayne Blvd., Suite 3600 • Miami, FL 33131
Phone: (305) 428-4500 • Fax: (305) 374-4744

DELAWARE FLORIDA ILLINOIS MARYLAND MASSACHUSETTS NEW JERSEY NEW YORK PENNSYLVANIA WASHINGTON, DC
A DELAWARE LIMITED LIABILITY PARTNERSHIP

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Jacqueline Marcus, Esq.
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Page 2

Invicta reserves all rights under 11 U.S.C. § 503(b) (9) to the extent the Goods are not timely returned. In addition, Invicta reserves the right to amend and supplement this reclamation claim and to make additional reclamation or other claims Invicta may have at law, in equity or otherwise. This reclamation claim is not intended to be and shall not be construed as an election of Invicta's remedies, a waiver of any past, present or future defaults or events of default by Sears or a waiver or limitation of any rights or remedies.

Please forward all communications concerning this matter to my office as counsel for Invicta.

Very truly yours,


Phillip M. Hudson III

PMH/am
Enclosure as stated
cc: Aline Drucker, Esq.

115149773.1

HISTORICAL

Invoice

Page 1/1
Invoice INV123038
Date 9/25/2018**Invicta Watch Company**3069 Taft Street
Hollywood FL 33021Bill To: Sears/SLS
3333 Beverly Road
Hoffman Estates IL 60179Ship To: Sears/SLS
8380 N. 4000 East Road
Manteno IL 60950

Purchase Order No.	Customer ID	Salesperson ID	Shipping Method	Payment Terms	Req Ship Date	Master No.	
558457	002333	212JS	MALCA-AMIT	NET 10	9/25/2018	10,142,935	
Ordered	Shipped	B/O	Item Number	Description	Discount	Unit Price	Ext. Price
20	20	0	0463	INVICTA Angel Lady 38mm Stainless Steel S	\$0.00	\$66.34	\$1,326.80
20	20	0	21691	INVICTA Angel Lady 38mm Stainless Steel G	\$0.00	\$51.36	\$1,027.20
20	20	0	23072	INVICTA Pro Diver Men 48.0mm Stainless St	\$0.00	\$62.06	\$1,241.20
40	40	0	22147	INVICTA Bolt Men 50mm Stainless Steel Bla	\$0.00	\$145.52	\$5,820.80
40	40	0	21719	INVICTA Pro Diver Men 40mm Stainless Stee	\$0.00	\$80.25	\$3,210.00
20	20	0	21425	INVICTA Angel Lady 36mm Stainless Steel +	\$0.00	\$55.64	\$1,112.80
20	20	0	19163	INVICTA Angel Lady 38mm Stainless Steel G	\$0.00	\$51.36	\$1,027.20
20	20	0	19428	INVICTA S1 Rally Men 52mm Stainless Steel	\$0.00	\$123.05	\$2,461.00

This is an EDI Transaction
STORE ID:0475

Subtotal	\$17,227.00
Misc	\$0.00
Tax	\$0.00
Freight	\$0.00
Trade Discount	\$0.00
Total	\$17,227.00

EXHIBIT
A

HISTORICAL

Invoice

Page 1/1
Invoice INV123137
Date 9/28/2018

Invicta Watch Company
 3069 Taft Street
 Hollywood FL 33021

Bill To: Sears/SLS
 3333 Beverly Road
 Hoffman Estates IL 60179 **Ship To:** Sears/SLS
 8380 N. 4000 East Road
 Manteno IL 60950

Purchase Order No.		Customer ID		Salesperson ID		Shipping Method	Payment Terms		Req Ship Date	Master No.
Ordered	Shipped	B/O	Item Number	Description			Discount	Unit Price	Ext. Price	
300	300	0	26079	INVICTA Pro Diver Men 50mm Stainless Steel			\$0.00	\$56.18	\$16,854.00	
220	220	0	25853	INVICTA Pro Diver Men 50mm Stainless Steel			\$0.00	\$102.72	\$22,598.40	
80	80	0	25991	INVICTA Marvel Men 53mm Stainless Steel B			\$0.00	\$144.45	\$11,556.00	
200	200	0	25288	INVICTA Speedway Men 51mm Stainless Steel			\$0.00	\$89.88	\$17,976.00	
400	400	0	26851	INVICTA Pro Diver Men 47mm Stainless Steel			\$0.00	\$133.75	\$53,500.00	
280	280	0	26848	INVICTA Pro Diver Men 47mm Stainless Steel			\$0.00	\$133.75	\$37,450.00	
300	300	0	28435	INVICTA Angel Lady 38mm Stainless Steel G			\$0.00	\$80.25	\$24,075.00	
200	200	0	28456	INVICTA Angel Lady 24mm Stainless Steel G			\$0.00	\$80.25	\$16,050.00	
300	300	0	28454	INVICTA Angel Lady 24mm Stainless Steel G			\$0.00	\$80.25	\$24,075.00	
200	200	0	28457	INVICTA Angel Lady 38mm Stainless Steel S			\$0.00	\$80.25	\$16,050.00	
300	300	0	28458	INVICTA Angel Lady 38mm Stainless Steel G			\$0.00	\$80.25	\$24,075.00	
200	200	0	28482	INVICTA Angel Lady 38mm Stainless Steel S			\$0.00	\$80.25	\$16,050.00	
300	300	0	28485	INVICTA Angel Lady 38mm Stainless Steel G			\$0.00	\$80.25	\$24,075.00	
520	520	0	26852	INVICTA Pro Diver Men 47mm Stainless Steel			\$0.00	\$133.75	\$69,550.00	

This is an EDI Transaction
 STORE ID:0475

Subtotal	\$373,934.40
Misc	\$0.00
Tax	\$0.00
Freight	\$0.00
Trade Discount	\$0.00
Total	\$373,934.40